

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB MARTINEZ CENTER 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32399-2400 RICK SCOTT GOVERNOR HERSCHEL T. VINYARD JR. SECRETARY

ELECTRONIC MAIL - READ RECEIPT REQUESTED

Perry Kent pkent@nrswa.org
Assistant Director
New River Solid Waste Association
P. O. Box 647
Raiford, Florida 32083

Re: Request for Additional Information Regarding Title V Renewal Application

File No. 1250008-007-AV New River Regional Landfill

Union County

Dear Mr. Kent:

The Department received your application for a Title V air operation permit renewal for the above referenced facility on July 16, 2013. The application was received in a timely manner and substantially addresses the information required to begin processing a Title V permit. However, in order to finish the processing of this application, the Department is requesting the additional information outlined below pursuant to Rules 62-213.420(1)(b)3. and 62-4.070(1), F.A.C. Should your response to any of the items below require new calculations, please submit the new calculations, assumptions, reference material and appropriate revised pages of the application form.

- The application lists numerous engines as insignificant emissions units. Please specify if any of these emissions units are subject to 40 CFR 60 Subpart IIII, Standards of performance for Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), 40 CFR 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, or 40 CFR 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines. If applicable,
 - a. Please specify how the facility is complying with the applicable subpart(s).
 - b. Please provide the following information for each engine:
 - 1. What type of fuel does the engine use (include sulfur content)?
 - 2. What type of engine do you have? (ex. Compression ignition or diesel (CI), spark ignition (SI), four stroke spark ignition that is lean burn (4SLB), two stroke lean burn (2SLB), dual (natural gas plus diesel) fired or landfill gas fired.)
 - 3. What is the HP (Hint: 1 HP = 0.7456 KW) of the stationary engine?
 - 4. Is the engine a stationary engine and therefore subject to the RICE requirements in the NESHAP or the NSPS? By contrast, a mobile (or relocatable) source engine could be a temporary replacement unit and located at a stationary source for less than 1 year and has been properly certified (with an engine label) as meeting the standards that would be applicable to such engine under the appropriate non-road engine provisions.
 - 5. Has the engine been refurbished/reconstructed? Upon reconstruction, an existing engine becomes subject to the relevant standards for new sources, including compliance dates, irrespective of any change in emissions of hazardous air pollutants from that source; therefore, has the engine ever had components replaced to such an extent that:
 - (a) The fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source; and
 - (b) It is technologically and economically feasible for the reconstructed source to meet the relevant standard(s) established by the Administrator (or a State) pursuant to section 112 of the Act.
 - 6. What is the date of manufacture of the engine (year and month, if possible)?
 - Note: Reconstructed engines are assigned a new date of manufacture if the fixed capital cost of the new and refurbished components exceeds 75 percent of the fixed capital cost of a comparable entirely new facility.
 - 7. Is the engine EPA Certified and labeled (what Tier of emission standards does the engine meet, if any)?
 - 8. When did you commence construction (date the engine was ordered) or reconstruction on your stationary engine (month, day and year)?
 - 9. What is the engine displacement (liters per cylinder)?
 - 10. Does the engine use an oxidation catalyst, diesel particulate filter (DPF), or selective catalytic reduction (SCR) (specify any controls employed)?

- 11. Does the engine have a continuous emissions monitoring system (CEMS) for any pollutants or a continuous parameter monitoring system (CPMS)?
- 12. What are the total hours of operation per year for the engine (estimate or based on historical)?
- 13. How many of the total hours are during an emergency situation (estimate or historical)?
- 14. How many of the total hours, if any, are part of the demand response program (if applicable)?
- 15. Is the engine used for peak shaving, to generate income for a facility to supply power to an electrical grid, or supply power as a part of a financial arrangement with another entity (state if future operation will include these modes of operation)?
- 16. For Fire Pumps: Is the engine part of a fire pump and was the engine manufactured as a certified National Fire Protection "Association (NFPA) engine after July 1, 2006? Is the engine a high speed engine (operation rated at or above 2,650 rpm)?

Responsible Official (R.O.) Certification Statement. Rule 62-213.420, F.A.C. requires that all Title V permit applications must be certified by a responsible official. Due to the nature of the information requested above, your response should be certified by the responsible official. Please complete and submit a new R.O. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 16, 2008.

<u>Professional Engineer (P.E.) Certification Statement.</u> Rule 62-4.050(3), F.A.C. requires that all applications for a Department permit must be certified by a professional engineer registered in the State of Florida. This requirement also applies to responses to Department requests for additional information of an engineering nature. If your responses to the items above result in changes or include new calculations, please complete and submit a new P.E. certification statement page from the long application form, DEP Form No. 62-210.900(1), effective March 11, 2010.

The Department must receive a response from you within 90 (ninety) days of receipt of this letter, unless you (the applicant) request additional time under Rule 62-213.420(1)(b)5., F.A.C.

If you have any questions, please contact the Project Engineer, Edward Svec, by telephone at 850/717-9031 or by email at ed.svec@dep.state.fl.us.

Sincerely,

Syed Arif, Environmental Administrator Office of Permitting and Compliance Division of Air Resource Management

SA/es

copy to:

Mr. George Reinhart, P.E., Jones Edmunds: greinhart@jonesedmunds.com

Mr. Joel Woolsey, Jones Edmunds: jwoolsey@jonesedmunds.com

Mr. Richard Rachal, DEP Northeast District: richard.rachal@dep.state.fl.us

Ms. Ana Oquendo, US EPA Region 4: oquendo.ana@epa.gov

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